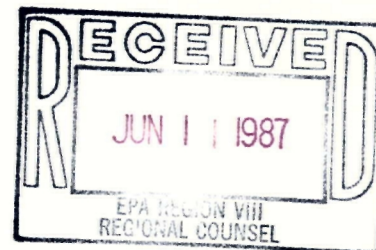


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LAW OFFICES OF  
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June 9, 1987

Ms. Sandra Moreno  
Office of Regional Counsel  
United States Environmental  
Protection Agency  
Region VIII  
999 Eighteenth Street  
Suite 500  
Denver, CO 80202-2405

Re: East Helena, Montana CERCLA Site

Dear Ms. Moreno:

As counsel to American Chemet Corporation, I submit herewith additional information in supplementation of my letter to you of March 24, 1987. That letter constituted American Chemet Corporation's initial response to USEPA's request for information under §104 of CERCLA dated February 23, 1987.

The supplemental information is as follows:

1. *Documentation of Real Estate Ownership* - Enclosed as Attachment 1 is a copy of the deed transferring 1.2 acres of real estate from ASARCO to American Chemet Corporation, together with copies of correspondence concerning 2.6 acres leased by American Chemet Corporation from the Burlington Northern Railway Company.
2. *Financial Information* - An audited financial statement for American Chemet Corporation for the year ending June 30, 1986, is attached as Attachment 2.
3. *Insurance Information* - Attachment 3 includes American Chemet Corporation's most recent insurance policies applicable to the East Helena plant. Insurance was provided by United States Fidelity and Guaranty Company from



ROOKS, PITTS AND POUST

Ms. Sandra Moreno  
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October 15, 1971, until October 15, 1974, under policy number SMP326119. American Chemet Corporation has been unable to locate insurance information with respect to insurance coverage prior to 1971.

4. *Record-keeping Procedures* - American Chemet Corporation maintains minutes from its Board of Directors meetings from 1946 to the present. Production records are available since 1950. Audited financial reports are available from 1947 to the present. Records of commercial transactions which have occurred over the last seven years are also maintained. All corporate records are stored at the East Helena, Montana plant or at American Chemet Corporation's Deerfield, Illinois principal office.

Please be advised that pursuant to 42 U.S.C. §9604(e)(7) and 40 C.F.R. Part 2 Subpart B, American Chemet Corporation hereby asserts a confidentiality claim covering the financial information in Attachment 2 to this letter. In accordance with the procedures of 40 C.F.R. §2.203(b), American Chemet Corporation has affixed the legend "Proprietary Information Not To Be Disclosed" on Attachment 2.

American Chemet Corporation believes that this letter and attachments together with its letter of March 24, 1987, constitute a complete response to the February 23, 1987, request for information. Any questions or comments concerning this matter should be addressed to me.

Very truly yours,



Clifton A. Lake

CAL/pg

Attachments